

Serial No. 09/659,066
Amendment Dated February 9, 2004:
Reply to Office Action dated September 9, 2003

REMARKS

Claims 1 and 9-14 have been amended. Reexamination and reconsideration are respectfully requested.

Initially, Applicants have amended claim 12 to be in independent form and to refer to a "voice reference apparatus". The apparatus classifies a plurality of search targets into a plurality of geographical areas in only one of which each of the plurality of search targets is located. Claim 13 has been made dependent upon claim 12 and also properly recites a "voice reference apparatus".

In view of the above, Applicants respectfully submit the rejection of claims 12 and 13 under 35 U.S.C. §112, second paragraph, is now moot. Applicants gratefully acknowledge the Examiner's notation with respect to the type of apparatus being claimed.

In the Office Action, claims 1-15 were newly rejected as obvious over SMITH et al. (US 6,184,823) in view of LEVIN et al. (US 6,173,279). Applicants respectfully traverse this new rejection in view of the following remarks.

Applicants' claim 1 recites a voice reference apparatus that classifies a plurality of search targets into a plurality of division blocks. Each search target is included in only one of the division blocks. The apparatus searches for a search target by first specifying a division block and then specifying the search target. Search targets belonging to a single category are categorized according to their attributes.

In Applicants' claimed apparatus, a recognition data selection device selects recognition data corresponding to a certain division block, as well as one or more other division blocks related to the certain division block based on

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division-block related information, from a first storage device. The recognition data selection device does this when the certain division block has been specified to search a certain search target. A voice recognition is performed based on the selected recognition data and audio data corresponding to the search target specified by voice.

As claimed, Applicants' voice reference apparatus requires that each of a plurality of search targets (for example, names of ski resorts, such as A ski resort, B ski resort, C ski resort, etc.) be included in one of a plurality of division blocks (for example, states such as Virginia or Maryland). Hence, in Applicants' claimed invention, by way of example, ski resorts A and B would be included in division block Virginia, whereas ski resort C would be included in division block Maryland. There is, therefore, no overlap of search targets between each of a plurality of division blocks.

By contrast, while SMITH may describe a geographic database 40 having a plurality of subsets, such as routing data 136, cartographic data 137, point-of-interest data 139, etc., (see col. 9, lines 14-29), the reason why SMITH's geographic database is divided into these subsets is because the division of the geographic database 40 provides for efficient use of the data by each of the different navigation functions of the navigation apparatus (see col. 9, lines 54-48). It therefore is a requirement of SMITH to provide a mechanism by which the different navigating functions that use the different subsets of the geographic database can work together (see col. 9, lines 54-48). To accomplish this, SMITH makes use of indices (for example, external indices 147) to allow the different navigating functions to work together in using the subsets (see col. 10, lines 1-8; Fig. 5). In effect, the indices provide cross-references for the navigating functions between the various subsets.

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By contrast, in Applicants' invention, as noted above, each of the search targets is included in only one of the division blocks. Thus, no overlap of the search targets between each of the division blocks occurs. Consequently, the cross-references used in SMITH et al., (i.e., the external indices, for example) are vastly different from Applicants' claimed "division block-related information" that indicates one or more other division blocks related to a certain division block through a "specific relationship in the category". In Applicants' invention, a second storage device is claimed in which the division block-related information is stored. As noted, that division block-related information indicates one or more other division blocks related to a certain division block through a specific relationship in the category.

In that regard, it should now be clear that Applicants' division block-related information is used for the function of searching a certain search target. Therefore, such division block-related information is not information necessary to allow different navigation functions to work together, which is the purpose of SMITH's indices 147 (col. 9, lines 54-58). Hence, SMITH's indices have nothing to do with Applicants' division block-related information.

In the Office Action, the Examiner asserts that LEVIN teaches categorizing the database details according to attributes (col. 8, lines 10-20). However, no where does LEVIN disclose or teach that the data is divided into a plurality of data sets in a category and, of course, no where does LEVIN disclose or even suggest the use of division block-related information as in the present invention. In view of the above, Applicants submit amended claim 1 is patentable over SMITH in view of LEVIN.

Similarly, Applicants have amended independent claims 9 and 10 to likewise clarify that the plurality of search targets are classified into a plurality

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of division blocks, wherein each of the search targets is included in only one of the division blocks. And, Applicants have clarified that the recognition data selection device selects recognition data when the certain division block has been specified to search a certain search target. Hence, for the reasons set forth above with respect to independent claim 1, Applicants submit independent claims 9, 10 and 11 are also patentable over SMITH in view of LEVIN.

As noted at the outset, Applicants have also rewritten claim 12 into independent form including the limitations of amended claim 1 while clarifying the "geographical area" and the "geographical relationship". The voice reference apparatus of claim 12 includes a second storage device in which geographical area-related information indicating one more other geographical areas related to a certain geographical area through a specific geographical relationship in the category is stored. Nowhere do SMITH and LEVIN disclose or suggest relating a plurality of geographic areas through a specific geographic relationship. Hence, for this reason alone, in addition to the reasons set forth above, Applicants submit claim 12 is patentable over SMITH in view of LEVIN.

Finally, Applicants' claims 2-8 and 13-15 depend, respectively, from one of the above independent claims and are also submitted to be patentable for the reasons set forth above.

Based on the foregoing, Applicants respectfully submit claims 1-15 are now in condition for allowance. An early notice that effect is solicited.


If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

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It is respectfully requested that, if necessary to effect a timely response, this paper be considered as a Petition for an Extension of Time sufficient to effect a timely response and shortages in other fees, be charged, or any overpayment in fees be credited, to the Deposit Account of Crowell & Moring, L.L.P., Account No. 05-1323 (Docket #1420/49237).

Respectfully submitted,

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